

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION

JEFFERSON-PILOT LIFE INSURANCE
COMPANY,

Plaintiff,

vs.

CHRISTOPHER L. KEARNEY,

Defendant.

Case No. C-1-02-479

(Judge Spiegel)
(Magistrate Judge Hogan)

NOTICE OF FILING PRIVILEGE
LOG

On May 14, 2004 counsel for Plaintiff hand delivered to counsel for Defendant a copy of its Privilege Log. There has since been one addition to the Privilege Log with regard to previously produced communications which should not have been produced. An updated copy is attached and being filed with the Court.

Respectfully submitted,

s/Amy Gasser Callow

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Peter M. Burrell (0044139)
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Trial Attorneys for Plaintiff
Jefferson-Pilot Life Insurance Company



CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing has been filed with the Court by electronic means on this 28th day of May 2004. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

s/Amy Gasser Callow
Amy Gasser Callow, Esq.

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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION

JEFFERSON-PILOT INSURANCE	:	
COMPANY,	:	Case No. C-1-02-479
	:	
Plaintiff,	:	(Judge Spiegel)
	:	
vs.	:	<u>PRIVILEGE LOG</u>
	:	
CHRISTOPHER L. KEARNEY,	:	
	:	
Defendant.	:	

The following documents have not been produced subject to a claim of privilege as specified below.

<u>Document Number</u>	<u>Document Identity</u>
2819-2820	Privileged communication from counsel to client
2932	Privileged communication from client to counsel
2934-2935	Privileged communication from client to counsel with notes
2938-2939	Privileged communication from client to counsel
2941-2944	Privileged communications from client to counsel
2949	Privileged communication from client to counsel
3151-3152	Privileged communication from counsel to client
3372	Privileged communication between counsel
3376	Privileged communication between counsel
3382	Privileged communication from client to counsel
3419	Privileged communication from client to counsel
3421-3423	Internal communication of Rotzel & Andress

<u>Document Number</u>	<u>Document Identity</u>
3430	Privileged communication between counsel
3480	Privileged communication between counsel
3493	Privileged communication between counsel
3497	Privileged communication from client to counsel
3508-3509	Privileged communication between counsel
3519	Privileged communication between counsel
3528	Privileged communication from client to counsel
3544	Privileged communication from client to counsel
3547	Privileged communication from client to counsel
3551	Privileged communication between counsel
3608-3609	Privileged communication from counsel to client
3610	Privileged communication from client to counsel
3616	Privileged communication from client to counsel
3623	Privileged communication from client to counsel
3625	Privileged communication from client to counsel
3643-3645	Privileged communication from counsel to client
3646	Privileged communication from client to counsel
3648	Privileged communication from client to counsel
3649	Privileged communication from counsel to client
3651	Privileged communication from counsel to client
3666	Privileged communication from counsel to client
3668	Privileged communication from counsel to client

<u>Document Number</u>	<u>Document Identity</u>
3669	Privileged communication from counsel to client
3671	Privileged communication from counsel to client
3674	Privileged communication to counsel from client
3677	Privileged communication to counsel from client
3678	Privileged communication from counsel to client
3680	Privileged communication from counsel to client
3691	Privileged communication from client to counsel
3697	Privileged communication from client to counsel
3705	Privileged communication between counsel
3707-3717	Privileged e-mail communication between counsel
3719-3723	Privileged communication between counsel
3724	Privileged communication between counsel
3726-3727	Privileged communication between counsel
3729-3773	Privileged communication between counsel
3777-3780	Privileged communication from counsel to client
3788-3789	Internal communication of Plaintiff's former counsel

In addition, the following privileged documents were inadvertently disclosed. These are clearly privileged communications which should be immediately returned to counsel for Plaintiff.

<u>Document Number</u>	<u>Document Identity</u>
564	Privileged communication from counsel to client
568	Privileged communication from counsel to client
570-71	Attorney work product

628-29	Privileged communication from counsel to client
3386-3387	Privileged correspondence from counsel to client
3388	Privileged e-mail communication between counsel
3393-3397	Privileged e-mail communication and correspondence between counsel and client
3400-3407	Privileged e-mail communications between counsel and client and hand-written attorney work product
3408-3409	Privileged correspondence from counsel to client
3410	Privileged correspondence from client to counsel
3411-3413	Privileged e-mail communications between counsel and client
3447-3450	Privileged correspondence from counsel to client
3657-3661	Attorney work product
3688	Privileged correspondence from client to counsel

Respectfully submitted,

s/Amy Gasser Callow

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Trial Attorneys for Plaintiff

207276.3

Notices1:02-cv-00479-SAS-TSH Jefferson-Pilot Life v. Kearney, et al**U.S. District Court****Southern District of Ohio****Notice of Electronic Filing**

The following transaction was received from Ellis, William entered on 5/28/2004 at 2:42 PM EDT and filed on 5/28/2004

Case Name: Jefferson-Pilot Life v. Kearney, et al
Case Number: 1:02-cv-479
Filer: Jefferson-Pilot Life Insurance Company
Document Number: 59

Docket Text:

NOTICE by Plaintiff Jefferson-Pilot Life Insurance Company of *Filing Privilege Log* (Attachments: # (1) Exhibit Privilege Log)(Ellis, William)

The following document(s) are associated with this transaction:

Document description:Main Document**Original filename:**n/a**Electronic document Stamp:**

[STAMP dcecfStamp_ID=1040326259 [Date=5/28/2004] [FileNumber=270547-0]
[3eb55eb91476d2e535b79be0bbffff20b9bd0e8a04d09b5dc2d5962de8d5d59316c0
367a2c0027b50c6435209ab91ee0ec2d820410811ca69d5aa4416896f123]]

Document description:Exhibit Privilege Log**Original filename:**n/a**Electronic document Stamp:**

[STAMP dcecfStamp_ID=1040326259 [Date=5/28/2004] [FileNumber=270547-1]
[45633b8b30e7a186008dfa070666d7e4504ea440064368f433b7bf3dae993db31b75
c8997710b6615dbf85c2aa55e26a9c2f07e5c0a502cbbc430b7296aacd99]]

1:02-cv-479 Notice will be electronically mailed to:

Peter M Burrell pmburrell@woodlamping.com,

Amy Gasser Callow agcallow@woodlamping.com,

William Robert Ellis wrellis@woodlamping.com,

Eugene Louis Matan ematan@mgwlaw.com,

Michael A Roberts mroberts@graydon.com

1:02-cv-479 Notice will not be electronically mailed to: